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April 20, 2005

## VIA HAND DELIVERY

Mary L. Cottrell, Secretary Department of Telecommunications and Energy One South Station, 2nd Floor Boston, MA 02110

Re: Request for Approval of Capacity Contract Renewal

Dear Ms. Cottrell:

Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil" or the "Company") hereby files with the Department of Telecommunications and Energy (the "Department") the original and nine (9) copies of its Petition for Approval of the Company's renewal of Tennessee Gas Pipeline Company ("Tennessee" or "TGP") Contract No.2915 ("TGP Contract No.2915" or the "Contract"). Enclosed also is our firm check in the amount of \$100 for the filing fee associated with this Petition.

Unitil's filing includes the prefiled testimony of Richard A. MacInnis and other supporting documentation to demonstrate that the Department's approval of Unitil's Petition (1) is consistent with the approved TGP Contract Restructuring Plan approved in D.T.E. 02-85 and the portfolio objectives established in the Company's Supply Plan as approved in D.T.E. 03-52 and; (2) compares favorably to the range of alternatives reasonably available to the Company and its customers. The testimony of Mr. MacInnis details and evaluates the decision to renew the Contract in terms of cost and non-cost factors, and explains how the decision is consistent with the resource requirements set forth in the Company's most recently-approved Supply Plan in D.T.E. 03-52.

Mary L. Cottrell, Secretary April 20, 2005 Page 2

Unitil is required to give renewal notification one year prior to the termination dates for the Company's capacity contracts with Tennessee. Unitil's TGP Contract No. 2915 is due to expire on March 31, 2006 and the contract would have automatically renewed for a term of five years if the Company did not notify TGP of a valid election by March 31, 2005. Unitil had the right to extend the Contract for any term at maximum rates. Unitil notified TGP in writing on March 22, 2005 that the Company had elected to extend the term of the Contract for a term of five years effective March 31, 2006. Unitil requests Department approval of this decision which is consistent with the TGP Contract Restructuring Plan approved in D.T.E. 02-85, is consistent with the portfolio objectives established in the Company's Supply Plan approved in D.T.E. 03-52, and compares favorably to the range of alternatives reasonably available to the company and its customers.

Thank you for your consideration and assistance in this matter.

Sincerely yours

Scott J. Mueller

SJM:rtm

Enclosures

cc: Andrew Kaplan, General Counsel, DTE
George Yiankos, Director, Gas Division, DTE
Andreas Thanos, Assistant Director, Gas Division, DTE
Joseph Rogers, Assistant Attorney General
David L. O'Connor, Division of Energy Resources

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